

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>03-160</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>MARK VALLE</b>	<b>:</b>	<b>VIOLATIONS: 21 U.S.C. § 846</b>
	<b>:</b>	<b>(Conspiracy to distribute more than 5</b>
	<b>:</b>	<b>kilograms of cocaine - 1 count)</b>
	<b>:</b>	<b>21 U.S.C. § 841(a)(1)(Distribution of</b>
	<b>:</b>	<b>more than 500 grams of cocaine - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (Aiding and abetting)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES:**

1. From at least in or around February 1997, to in or around April 2002, in the Eastern District of Pennsylvania and elsewhere, the defendant,

**MARK VALLE,**

did conspire and agree with others known and unknown to the United States Attorney, to knowingly and intentionally distribute an amount in excess of 5 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**MANNER AND MEANS**

2. It was the plan and purpose of the conspiracy to bring cocaine brought from New York into the Eastern District of Pennsylvania, then sell the cocaine in the Eastern District of Pennsylvania for profit.

## **OVERT ACTS**

In furtherance of the conspiracy, and to achieve its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. In or around late February 1997, ANTONIO SANTOS VALLE, charged elsewhere, stored approximately 500 grams of cocaine inside the first floor apartment at 1244 Lehigh Street, Easton, Pennsylvania.
2. In or around late February 1997, ANTONIO SANTOS VALLE directed the defendant, **MARK VALLE**, to remove the approximately 500 grams of cocaine from inside the first floor apartment at 1244 Lehigh Street, Easton, Pennsylvania.
3. In or around late February 1997, defendant **MARK VALLE** removed the approximately 500 grams of cocaine from inside the first floor apartment at 1244 Lehigh Street, Easton, Pennsylvania, and sold it.
4. In or around January 1999, defendant **MARK VALLE**, using the pager and cellular telephone of ANTONIO SANTOS VALLE, began distributing cocaine to former customers of ANTONIO SANTOS VALLE, with identities known and unknown to the United States Attorney.
5. From in or around spring 1999, until in or around April 2002, defendant **MARK VALLE** distributed cocaine to a person known to the United States Attorney.
6. In or around February 2000, defendant **MARK VALLE**, together with CARMEN GONZALEZ, charged elsewhere, purchased cocaine in New York, transported the cocaine to the Eastern District of Pennsylvania, and sold it.
7. From in or around August 2000 until in or around September 2000, defendant

**MARK VALLE** sold cocaine to **ANTONIO SANTOS VALLE**, who in turn distributed that cocaine to persons unknown to the United States Attorney, making sales from rooms of the McIntosh Inn, 1701 Catasaqua Road, Allentown, Pennsylvania.

8. From in or around September 2000 until late October 2000, defendant **MARK VALLE** sold cocaine to **ANTONIO SANTOS VALLE**, who in turn distributed that cocaine to persons unknown to the United States Attorney, making sales from rooms of the Red Roof Inn, 1846 Catasaqua Road, Allentown, Pennsylvania.

9. From in or around late December 2000 until early January 2001, defendant **MARK VALLE** sold cocaine to **ANTONIO SANTOS VALLE**, who in turn distributed that cocaine to persons unknown to the United States Attorney, making sales from Room 201 of the Days Inn, Route 22 and 25<sup>th</sup> Street Shopping Center, Easton, Pennsylvania.

10. On or about January 9, 2001, defendant **MARK VALLE** possessed \$14,500, with which he intended to purchase cocaine in New York.

11. From in or around March 2001, until at least late April 2002, defendant **MARK VALLE** distributed cocaine to a person known to the United States Attorney.

12. From in or around January 2002, until at least late April, 2002, defendant **MARK VALLE** stored kilogram quantities of cocaine at the residence of a person known to the United States Attorney, supplying that person with a safe, locking the cocaine inside the safe, and removing the cocaine from the safe in order to distribute it to persons known and unknown to the United States Attorney.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE UNITED STATES ATTORNEY CHARGES FURTHER:**

In or about January 2001, at Easton, in the Eastern District of Pennsylvania, the  
defendant,

**MARK VALLE**

knowingly and intentionally distributed, and aided and abetted the distribution of, in excess of 500  
grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II  
controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B),  
and Title 18, United States Code, Section 2.

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PATRICK L. MEEHAN  
United States Attorney